

Hon. John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN E. COLLINS, JR., a/k/a JAKE E.  
COLLINS, JR., an individual,

Plaintiff,

vs.

NOVA ASSOCIATION MANAGEMENT  
PARTNERS, LLC, a Washington limited  
liability company; SOUND LEGAL  
PARTNERS, LLC, a Washington limited  
liability company; RACHEL RAPP  
BURKEMPER, an individual; and VILLA  
MARINA ASSOCIATION OF  
APARTMENT OWNERS,

Defendants.

No. 2:20-cv-01206-JCC

STIPULATION AND ORDER STAYING  
DISCOVERY PENDING DECISIONS ON  
DEFENDANTS' MOTIONS TO DISMISS

NOTED FOR HEARING:  
NOVEMBER 24, 2020

[PROPOSED]

**I. STIPULATION**

Defendants have each moved to dismiss Plaintiff's claims in their respective Rule 12(b)(6) Motions to Dismiss. (Dkt 15, 17).

The Parties, through their respective counsel, wish to avoid costly and/or intrusive discovery to the extent that it may not be needed, and agree that it is in all Parties' interests to stay discovery pending a decision on Defendants' motions to dismiss.

The Parties therefore propose the following stipulation to the Court, and request that the Court adopt the following stipulation of the Parties.

STIPULATION AND ORDER STAYING DISCOVERY  
PENDING DECISIONS ON DEFENDANTS' MOTIONS  
TO DISMISS - 1  
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1           1.       The Parties stipulate that all discovery in this case should be stayed until an  
2 Order is entered on Defendants' Rule 12(b)(6) Motions to Dismiss. (Dkr 15, 17).

3           2.       The Parties stipulate that they shall not engage in discovery of any type prior to  
4 entry of such an Order.

5           3.       The Parties stipulate that, after an Order is entered on Defendants' Rule 12(b)(6)  
6 Motions to Dismiss, the discovery stay should be be lifted and discovery should be permitted to  
7 commence as to Parties or issues that may remain after such Order is entered, if any.

8           Submitted jointly this 24th day of November, 2020.

9  
10           s/ Ha Thu Dao  
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STIPULATION AND ORDER STAYING DISCOVERY  
PENDING DECISIONS ON DEFENDANTS' MOTIONS

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**II. ORDER**

The Court, having reviewed the Parties' Stipulation to Stay Discovery Pending Decisions of Defendants' Rule 12(b)(6) Motions to Dismiss, finds good cause to now enter the following Order:

1. It is hereby Ordered that all discovery in this case is hereby stayed until an Order is entered on Defendants' Rule 12(b)(6) Motions to Dismiss. (Dkr 15, 17).

2. The Parties may not engage in discovery of any type prior to such an Order.

3. After an Order is entered on Defendants' Rule 12(b)(6) Motions to Dismiss, this discovery stay shall be lifted without further action, and discovery may then commence as to Parties or issues that may remain after the Order is entered, if any.

IT IS SO ORDERED.

Entered this \_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
Hon. John C. Coughenour  
U.S. District Court Judge